March 9, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Higher Ground LLC, Blanket License Application for C-band Mobile Earth Terminals, IBFS File No. SES-LIC-20150616-00357

Dear Ms. Dortch:

Kenergy Corporation, an Electric Distribution Cooperative serving 56,663 member-owners in 14 western Kentucky counties, wishes to add its name to the list of private microwave operators who are opposed to the proposed grant of use in the 5925-6425 frequency band to Higher Ground LLC by the Federal Communications Commission. Kenergy currently operates a private operational fixed microwave network across the 14 western Kentucky counties that comprise our service territory. As an electric utility for a good portion of the state of Kentucky, Kenergy is considered an essential service provider.

The 20 licensed paths in this frequency band in use by Kenergy are utilized for the transport of telemetry, control, security, customer information, telephony and two-way radio traffic. These items are critical to the daily operations of the Cooperative, and are the reason Kenergy participated in frequency coordination and acquired FCC licenses for this spectrum. Allowing other entities to operate in this spectrum, negates the purpose of such frequency coordination and violates the purpose and nature of FCC licensing in this situation.

Assurances by the FCC that Higher Ground LLC’s proposed system should prevent or minimize the risk of harmful interference to FS operators in the 5925-6425 frequency band fails to take into consideration that only one untimely interference could possibly result in significant system disruption, or the injury or death of a Cooperative employee working on high voltage equipment in the field.

Kenergy has recently migrated from the 2 GHz analog microwave spectrum due to the AWS auction, at significant cost. 6 GHz spectrum was chosen for its operational characteristics, and also that it could be licensed to eliminate interference issues. This proposed allowance of use of this spectrum by Higher Ground LLC would negate our cost expenditures and licensing work, implemented due to reallocation of spectrum by the FCC previously. Kenergy believes that this use of the spectrum, as proposed by Higher Ground LLC should be disallowed as it violates the very nature and purpose of licensed spectrum and could impose operational and safety issues for our intended use of our FCC licensed systems.

Sincerely,

Scott Gentry
Manager of Technical Services
Kenergy